



# MEMO ENDORSED

Application Granted. The time for the parties to submit a joint request to charge and any proposed voir dire is extended to April 9, 2021. The March 31, 2021 teleconference is adjourned to April 21, 2021 at 2:30 p.m. The dial-in number for the conference is (888) 363-4749. The access code is 3070580.

March 24, 2021

## VIA ELECTRONIC FILING

Judge William H. Pauley III  
United States Courthouse  
500 Pearl Street, Room 1920  
New York, New York 10007

**Re: Cedric Marshall v. The Port Authority of New York and New Jersey et al.**  
**Docket No. 19-cv- 02168 (WHP)**

Dear Judge Pauley:

This office represents the remaining defendants, Port Authority Police Officers Bryan Mathews and Sean Gallagher ("Defendants") in the above-referenced action. Pursuant Your Honor's Scheduling Order, dated December 4, 2020 (D.E. 67), the parties were directed to submit a joint request to charge and separately submit any proposed voir dire by March 26, 2021, and to appear for a conference with the Court on March 31, 2021. I am writing on behalf of my colleague, David R. Kromm, Esq., the handling attorney on this matter, to request adjournments and extensions of the above deadlines. The reason for the request is that Mr. Kromm has a medical emergency that required immediate surgery and an ongoing hospital stay. There were no prior requests to extend these dates. Today, my office placed two calls to Plaintiff counsel's office, and I followed up with an email requesting consent. Plaintiff counsel's office notified us that Plaintiff's counsel was in a conference today. As such, due to the emergent circumstances we were unable to obtain consent for this request. This request will not affect any other dates as these are the only remaining dates currently on the docket.

Due to the above, Defendants respectfully request that the March 26, 2021 deadline for submission of a joint request to charge and proposed voir dire, and the March 31, 2021 conference with the Court be adjourned and that Your Honor permit the selection of new dates to occur once Mr. Kromm is discharged from the hospital and can contact Plaintiff's counsel and the Court regarding same. In the alternative, Defendants respectfully request a two-week extension of both dates.

Dated: March 25, 2021

Respectfully submitted, New York, New York

The Port Authority Law Department

By: \_\_\_\_\_

Paulo C. Alves, Esq.  
(212) 435-3433

SO ORDERED:

WILLIAM H. PAULEY III  
U.S.D.J.



cc: All parties via ECF